

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Odin Post Office
Odin, MN 56160

Docket No. A2012-93

PUBLIC REPRESENTATIVE COMMENTS

(February 8, 2012)

On November 30, 2011, the Postal Regulatory Commission (Commission) received two appeals postmarked November 19, 2011 from Paul S. Berg and Robert D. Harder (Petitioners). The Petitioners objected to the discontinuance of the Odin Post Office in Odin, Minnesota.

Petitioner Harder, President of the Odin State Bank (Bank), states that the closure of the Odin Post Office will create many hardships for the Bank and will impact its ability to provide timely services to its customers. If the Odin Post Office is closed, Petitioner Harder states that it will result in: later delivery times than currently occurs; security issues if the Bank must use an outside mail box for mail delivery; and limit the ability of the Bank to obtain timely retail postal services.¹

Petitioner Berg, an insurance agent for the R.D. Harder Insurance Agency, objects to the Odin Post Office Closure because a rural mail carrier is at best in the community for 30 minutes. Therefore, the time available for picking up mail and selling postage and postal services will be limited. Mr. Harder requests that if the Odin Post Office is closed then a blue mail box should be installed in the community with an

¹ Petition for Review Received from Robert D. Harder Regarding the Odin, MN Post Office 56160, November 30, 2011.

evening pick up time. Mr. Berg states that insurance agents are under time constraints dictated by the State of Minnesota and closing the Odin Post Office would impact his ability to meet those constraints.²

In its Comments, the Postal Service identified three areas of concern expressed by the Odin postal customers: “(1) the impact on the provision of postal services, (2) the impact upon the Odin community, and (3) the calculation of economic savings expected to result from discontinuing the Odin Post Office.”³

Impact on the provision of Postal Services. The Postal Service proposes to close the Odin Post Office, an EAS-11 post office located approximately 2.9 miles from the Ormsby Post Office,⁴ an EAS-11 level office, and seven miles from the Butterfield Post Office, an EAS-13 level office.⁵ The Postal Service determined that when the Final Determination is implemented the Butterfield Post Office will administer rural route delivery or contract delivery carrier service for the Odin Post Office patrons.⁶ The Postal Service proposed a rural route delivery service, which it says will provide customers with regular and effective service to customers. *Id.* at 1.

The Odin Post Office has 48 post office boxes rented. Its office hours are 8:00 a.m. to noon and 1:00 p.m. to 4:00 pm, Monday through Friday and 7:30 a.m. to 8:30 a.m. on Saturday. The current workload is approximately 10 daily transactions with a

² Petition for Review Received from Paul S. Berg Regarding the Odin, MN Post Office 56160, November 30, 2011.

³ United States Postal Service Comments Regarding Appeal, January 24, 2012, Comments at 1.

⁴ The Ormsby Post Office has been identified as a candidate for Retail Access Optimization Access. See local map attached.

⁵ AR, Item No. 47 at 2. No page numbers appear on Item No. 47, so the Public Representative counted pages to facilitate identification.

⁶ Administrative Record (AR), Item No. 4 at 1. See *also*, Item No. 47 at 9.

workload of approximately 10 minutes. AR, Item No. 10 at 1. The Final Determination indicates that the current workload is less than 1.7 hours per day.⁷

The Butterfield Post Office has 140 post office boxes available for rent – a sufficient number of P.O. Boxes available for rent by the patrons of the Odin Post Office.⁸ The Butterfield Post Office hours of operation are 8:00 a.m. to 11:00 a.m. and 1:30 p.m. to 4:00 p.m. Monday through Friday and 9:45 a.m. to 11:00 a.m. on Saturdays.

Impact on the community. Odin, Minnesota is an incorporated community located in Watonwan County.⁹ The community is administrated politically by the Odin City Council. AR, Item No. 47 at 7. The local population of Odin, Minnesota is 106 as of the 2010 census – down from the 2000 census data of 125.¹⁰ The city has a total area of 0.4 square miles (2.1 km²), all of it land.¹¹ The median income is \$25,625. *Id.*

On June 13, 2011, the Postal Service distributed 108 questionnaires to Odin delivery customers. AR, Item No. 23 at 1. Forty-eight questionnaires were returned. Of the 48, 3 were favorable, 23 were unfavorable and 22 expressed no opinion. AR, Item No. 47 at 2. Several questionnaire respondents indicated that Odin residents currently shop, conduct banking transactions and fulfill their social needs in locations outside of Odin.¹² Therefore, it appears that closing the Odin Post Office may have limited impact on postal patrons existing shopping patterns. Odin customers will retain the community

⁷ *Id.*, Item No. 47 at 2.

⁸ AR, Item No. 33 at 2.

⁹ AR, Item No. 3 at 1.

¹⁰ http://en.wikipedia.org/wiki/Odin,_Minnesota

¹¹ http://en.wikipedia.org/wiki/Odin,_Minnesota

¹² AR, Item No. 22, no page numbers given. For example, see responders V. Brudellie; V. Beckendork and W. Rettke.

name in their mailing address and a carrier route address will be assigned if the Final Determination is implemented. AR, Item 47 at 7.

On June 28, 2011, representatives from the Postal Service held a meeting at the Odin City Hall to respond to questions and provide information to postal patrons – 43 customers attended the meeting. *Id.*

The Office of Senator Al Franken submitted an “Authorization to Release Information” to the Postal Service requesting information on behalf of Martha S. Eng. AR, Item No. 28 at 1. The Postal Service responded to Senator Franken on July 11, 2011. *Id.*, at 3.

Effect on employees. In the Postal Service’s Final Determination (FD), it reported that the postmaster retired on September 29, 2009. AR, Item 47 at 2. Since then a non-career postmaster relief has been serving as the Officer-in-Charge (OIC) of the Odin Post Office. *Id.* at 7. If the Odin Post Office is closed the OIC may be separated from the Postal Service, if there are no appropriate postal positions. *Id.*

Economic savings. The Postal Service initiated the study for possible closure or consolidation of the Odin Post Office for the following reasons: declining workload and revenues and the ability of the Postal Service to provide effective and regular service by an alternate means. *Id.*, Item No. 47 at 2. The declining revenues and revenue units are provided for the past three years in Table I below. *Id.*

Table I

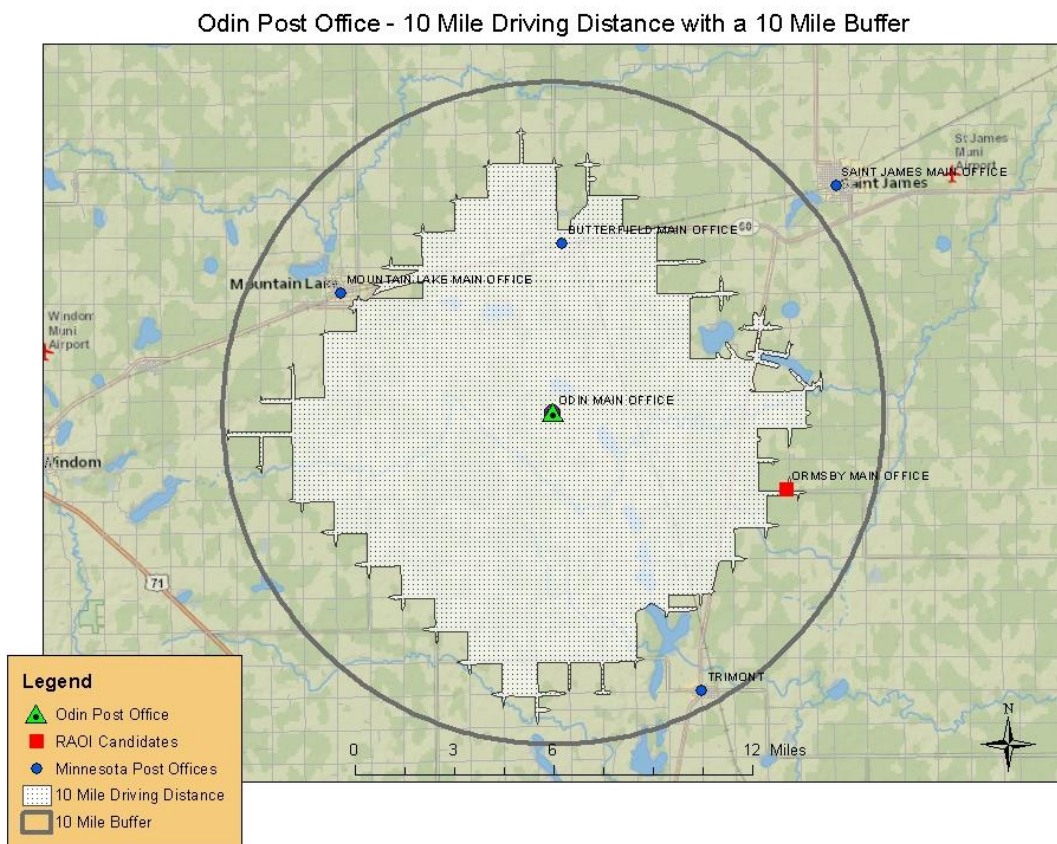
| Year | Revenues | Revenues Units |
|---------|----------|----------------|
| FY 2008 | \$22,114 | 58 |
| FY 2009 | \$23,021 | 60 |
| FY 2010 | \$19,087 | 50 |

In closing the Odin Post Office, the Postal Service estimates the annual savings to be \$43,505. That includes the EAS-11 postmaster's salary and fringe benefits of \$42,456 plus the annual lease costs of \$7,140, less the annual cost of replacement service of \$6,091. *Id.*, 47 at 7. The Public Representative notes that the Odin Postmaster's salary and fringe benefits for its EAS-11 Post Offices is \$42,456. *Id.* However, a review of the Harris Post Office and EAS-11 Post Office shows that the Postmaster's salary and fringe benefits are \$44,279.¹³ While the difference in salary estimates is \$1,823 for the same EAS-11 post office, the Public Representative suggests that Postal Service may want to ensure that it uses the same salary rates for each of the EAS level postmasters for all Post Office Closings, so that the perception of fairness and equity is clearly evident.

Finding. The Public Representative (PR) finds that the Postal Service has adequately considered the Petitioners' concerns and has not found a persuasive argument, which would prevent the Commission from affirming the Postal Service's determination to close the Odin Post Office. However, the PR recommends that a blue collection box be placed in Odin with a late afternoon or evening pick-up time. The PR concludes that the Postal Service has followed applicable procedures, that the decision

¹³ Docket No. A2012-80. See AR, 41 at 7.

to close the Odin Post Office does not appear to be either arbitrary or capricious and that the Postal Service has provided the information it used in forming its decision to close the Odin Post Office. Correcting inconsistent cost assumptions between dockets may be helpful to the Commission as it deliberates its decision to affirm or remand a closing proposal. For informational purposes, a local map follows.



Respectfully Submitted,

/s/ Pamela Thompson
Public Representative
for Docket No. A2012-65

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